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*Attorney for Plaintiff and Counter-Defendant
Moog Inc.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC. ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS. 1-50,

Defendants.

Case No. 2:22-cv-09094-GW-MAR

**PLAINTIFF AND COUNTER-
DEFENDANT MOOG INC.'S
APPLICATION FOR LEAVE TO
FILE UNDER SEAL DESIGNATED
MATERIALS FROM ITS
OPPOSITION TO SKYRYSE'S
MOTION OBJECTING TO JUDGE
ROCCONI'S JUNE 14, 2023 ORDER**

Judge: Hon. George H. Wu

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SKYRYSE, INC.,
Counterclaimant,
vs.
MOOG INC.,
Counter-Defendant.

1 **TO THE ABOVE CAPTIONED COURT, AND TO ALL PARTIES**
2 **AND THEIR ATTORNEYS OF RECORD:**

3 Pursuant to Local Rule 79-5 *et seq.*, Plaintiff and Counter-Defendant Moog
4 Inc. (“Moog”) hereby submits this application for an order permitting it to file under
5 seal certain excerpts and documents (the “Designated Materials”) from Moog’s
6 Opposition to defendant Skyryse, Inc.’s (“Skyryse”) motion objecting to Judge
7 Rocconi’s June 14, 2023 order regarding Moog’s trade secret identification (the
8 “Opposition”).

9 Moog submits that compelling reasons exist to permit the Designated
10 Materials to be filed under seal. The Designated Materials include documents that
11 have been identified as Protected Material pursuant to the Protective Order entered
12 in this action on May 6, 2022 (the “Protective Order”) (Dkt. 89), which are
13 referenced and/or depicted in the Opposition. Specifically, the Opposition references
14 and depicts contents from Moog’s trade secret identification served on February 21,
15 2023, which is designated as “HIGHLY CONFIDENTIAL—OUTSIDE COUNSEL
16 AND EXPERTS’ EYES ONLY.” The material that Moog requests to file under seal
17 is the type of information that Moog does not make public, does not share with
18 competitors, and keeps confidential in its business. If disclosed publicly, it could be
19 used by Moog’s competitors to secure unfair competitive advantage and cause
20 irreparable business harm.

21 Specifically, Moog seeks to file the following Designated Materials under
22 seal: highlighted portions of Moog’s Opposition at page 21:25 and the embedded
23 figure on the top half of page 22.

24 This application is further based upon the accompanying Declaration of
25 Kazim Naqvi in Support of this Application; any pleadings, files, and records in this
26 action; and any further evidence or argument as this Court may consider.

1 Dated: August 3, 2023

2 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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4 By /s/ Kazim A. Naqvi
5 Kazim A. Naqvi

6 Attorney for Plaintiff and Counter-Defendant
7 MOOG INC.
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